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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ALLISON MARIE BAVER,

Defendant.

**RESPONSE TO ALLISON BAVER'S  
MOTION TO STAY FORFEITURE  
PENDING APPEAL**

Case No. 2:21-cr-00520-JNP

Judge Jill N. Parrish

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The United States of America submits this response to the defendant's Motion to Stay Forfeiture Pending Appeal (ECF 227). The motion requests that the court stay the forfeiture during the pendency of the defendant's anticipated appeal under Fed. R. Crim. P. 32.2(d). The United States does not oppose this request. However, as indicated in the United States' Opposition to Allison Bayer Entertainment, LLC's Motion for Stay of Proceedings (ECF 229), such a stay of the forfeiture will not and should not prevent the

court from addressing third-party petitions in the ancillary proceeding. Rule 32.2(d) provides that a stay of the forfeiture pending appeal by the defendant “does not delay the ancillary proceeding or the determination of a third party’s rights or interests.”

Respectfully submitted,

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/s/ Travis K. Elder  
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